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CLIENT/MATTER NUMBER  
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October 9, 2001

## By Facsimile and E-Mail

Mr. Sam McClerren  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Re: Wholesale Performance Measures Rulemaking Workshop:  
Comments Pertaining to Performance Measures

Dear Mr. McClerren:

In response to your request, and on behalf of our client, PrimeCo Personal Communications, we are writing to specify the level of detail that we believe should be included in the wholesale performance measures that will comprise Code Part 731. In addition, we are providing you with our thoughts regarding the manner in which the workshop should develop the appropriate business rules for proposed wholesale performance measures.

Based on our review of the sample Ameritech and Verizon business rules distributed at the September 26, 2001 meeting of the Wholesale Performance Measures Rulemaking Workshop, we believe that the contemplated wholesale performance measures should include:

- the name of the measure;
- a definition of the measure;
- any appropriate exclusions;

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- the method by which the measure will be calculated; and
- the performance standard.<sup>1</sup>

This level of detail will provide information sufficient to identify and understand the performance requirements that ILECs must satisfy as well as provide a standardized method for measuring their performance. The other elements included in Ameritech's and Verizon's sample business rules are either directly or indirectly incorporated in the foregoing or are not necessary elements of a performance measure.

Finally, the workshop should develop the appropriate business rules for each performance measure by requiring the party that proposes a performance measure and its associated business rules to explain the five elements identified above and why the performance measure is needed. After all proposed performance measures are submitted, the proposed measures should be distributed to the parties and the parties should attempt to reach consensus on the elements of each performance measure. Thereafter, the parties should seek to reach consensus on whether the proposed performance measure is necessary and if so, what the performance standard for each measure should be.

Please contact me if you have questions or need any additional information.

Very truly yours,

John W. McCaffrey

cc: Kenneth Borner  
Juan Ramirez  
Lester Tsuyuki  
Kathleen Pasulka-Brown, Esq.

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<sup>1</sup> Consistent with the legislative amendments to the Public Utilities Act, what Ameritech refers to as a "Benchmark" is more properly referred to as a "Performance Standard", as in Verizon's sample business rule. A "benchmark" is a reference point that may be used as a means by which to evaluate performance. A "standard", on the other hand, is a recognized level of performance that must be satisfied in order to provide acceptable service. "Standards" are what is required to ensure that the quality of service provided by ILECs will facilitate the development of competition in Illinois' telecommunications market.